

M E M O R A N D U M

EPA Region 5 Records Ctr.



393347

DATE: February 5, 1986  
 TO: Rama Chaturvedi, DLPC - Permit Section  
 FROM: Chuck Reeter - DLPC - Collinsville  
 SUBJECT: Facility Management Plan  
 LPC 1190400008 - Madison County - Granite City/Jennison-Wright Corporation

RECEIVED  
 FEB 07 1986  
 IEPA-DLPC

3. <u>Source</u>	<u>Date</u>	<u>Received By</u>	<u>Subject Response</u>
Citizen Complaint	12/30/85	IEPA-DLPC	Open dumping of wood scraps off-site - follow-up inspection conducted 12/30/85

4. <u>Date of Inspection</u>	<u>Inspector</u>	<u>Conclusions</u>
3/24/83	State	1. Failure to notify USEPA of hazardous waste activities and obtain USEPA number. 2. Failure to obtain State operating permit. 3. Failure to maintain administrative records as required in 40 CFR 265 of 35 Ill. Adm. Code 725.
3/22/84	State	IEPA and Attorney General combined inspection to gather information and observe facility for pending litigation. Alleged violations: 1. Old and formerly used creosote disposal sites (off-site). 2. Currently used unlined creosote pits encompassing the treatment cylinders for storage and disposal of hazardous wastes. 3. Hazardous waste and creosote drippage along spill tracks outside the treatment cylinder areas.
8/29/84	Federal	USEPA contractor inspected facility with respect to RCRA Subpart F Groundwater monitoring regulations, 35 Ill. Adm. Code Part 725 and 40 CFR 265. Jennison-Wright does not have a groundwater monitoring program and were found to be totally deficient. Violations: 725.190, 725.191, 725.192, 725.193 and 725.194.

FMP

LPC 1190400008

Madison County

Granite City/Jennison-Wright Corp. -2-

February 5, 1986

3/26/85            State            An IEPA multi-media inspection was conducted. Following RCRA violations were charged of the 35 Ill. Adm. Code: 703.150(a), 725.114(c), 725.115, 725.116, 725.131, 725.137, 725.152, 725.153, 725.175, 725.190, 725.191, 725.192, 725.193, 725.194, 725.212, 725.242, 725.273, 725.274, 725.322, 725.323, 725.326, 725.351, 725.353

1/8/86            State            IEPA RCRA Subpart F Groundwater monitoring inspection. Following violations of the 35 Ill. Adm. Code were charged: 725.190, 725.191, 725.192, 725.193, 725.194

5. Yes - On the inspection dates of 3/22/84, 8/29/84, 3/26/85 and 1/8/86 various land disposal areas were observed, documented and photographed. A total of 3 land disposal areas are known to exist from these inspections and from admittance by Jennison-Wright attorney, Mike Cyphert. Mr. Cyphert indicated 3 separate areas where he claimed the previous owners of Jennison-Wright (prior to 1981) disposed of and buried creosote wastes. One disposal area was along the railroad tracks at the far northeast corner of the site. Another disposal area is in the northeast corner of the facility that is south of 22nd Street. The third area is located toward the southeast portion of the facility next to the fence between the creosote and Jennite areas.
6. Yes - The inspection dates of 3/24/83, 3/22/84, 8/29/84, 3/26/85 and 1/8/86 indicate from reports, memorandums and photographs that large areas of discolored and creosote contaminated soils exist at the facility. Dripping and spillage of creosote along the tracks and tie storage areas has been observed and recorded during all inspections. Very little vegetation exists on the facility, but that which does appears to show signs of stress as observed in inspection photographs (3/22/84, 8/29/84, 1/8/86). Various levels of soil and groundwater contamination were identified in the Ecology and Environment, Inc., consultant to Jennison-Wright, report of January 18, 1985. The apparent causes of contamination at the facility are from creosote spillage, unlined creosote storage pits, 3 known land disposal areas of creosote, uncontained drip tracks and uncontained treated wood storage areas. Off-site contamination from the migration of creosote is also indicated on 3/22/84, 8/29/84 and 3/26/85 inspections.

FMP

LPC 1190400008

Madison County

Granite City/Jennison-Wright Corp. -3-

February 5, 1986

7. Yes - Two cisterns are known to exist within the creosote process area and adjacent to the storage pit that encompasses the treatment cylinders identified in 3/22/84, 8/29/84, 3/26/85 and 1/8/86 inspections. The creosote flows into these cisterns and then is pumped into an oil/water separator tank. In the tank, the water is separated and discharged directly into the sanitary sewer, while the creosote is re-used. The oil/water separator tank is an unlined pit. Creosote sludge that collects at the bottom of the oil/water separator tank or pit is not reclaimed as per 3/26/85 inspection. Since these tanks are known to be unlined, it is quite probable that they are leaking creosote wastes and are contributing to the subsurface contamination.

CVR:jlr/0133:

cc: DLPC - Collinsville

cc: LPC - Division File

cc: Steve Davis

cc: Karen Nachtwey